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MEMORANDUM

TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/ko/53 DATE: October 31, 2006

C.C.: RRG/Clayton Site Technical Committee
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Status Report #12 for the Resource Recovery Group/Clayton Chemical Company Site**

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this twelfth Monthly Status Report is September 18, 2006, through October 20, 2006.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (the Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report #11 was submitted to U.S. EPA on October 2, 2006

1.0 COMPLETED ACTIVITIES

1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE

Activities completed during the reporting period centered on selecting a soil treatment technology for the management of the mixed waste (Resources Conservation and Recovery Act [RCRA] and Toxic Substance Control Act [TSCA]) soils that have been generated from excavation activities, reestablishing an onsite presence, and reinitiating waste shipment activities. Additional details of the completed tasks are provided for review in this report.

A weekly summary of activities appears below:

- During the week of September 18, 2006 (September 18 – 22, 2006), no on site activities were completed for the RRG/Clayton Chemical Site. Offsite work primarily consisted of developing a soil/material

management plan for submission to U.S. EPA. Plan development activities primarily consisted of completing a technical and cost comparison of different treatment and disposal options to manage the excavated soils from the eastern portion of the Site that were found to contain RCRA hazardous compounds and polychlorinated biphenyls (PCBs) above the TSCA limits. CRA also continued dialog with Veolia Environmental Services (Veolia) related to the disposal of the contents of tank G8, ponded stormwater from atop tank G8, and various other wastes at the Site;

- The primary activities completed during the week of September 25, 2006, involved the submission of the selected soil/material management technology to U.S. EPA through verbal and written means, and the mobilization to the Site. On September 25, 2006, a conference call was held between U.S. EPA and The Respondents during which preliminary information on the proposed soil treatment method was presented. The proposed treatment/solution involved the use of chemical oxidation to remove the RCRA volatile organic compounds (VOCs) component of the mixed waste, or chemical fixation to address RCRA lead concentrations, followed by off site disposal of the resultant TSCA soils. OSC Turner requested that additional information be provided to support/clarify the proposed technology, and that a written revision be submitted by September 28, 2006. He also suggested that personnel be mobilized to the Site prior to October 1, 2006. Subsequent to the conference call, The Respondents prepared the revised written proposal and submitted it on Thursday, September 28, 2006. The respondents also made arrangements for project personnel to mobilize to the Site. On Friday, September 29, 2006, personnel from CRA, Brandenburg Industrial Services Company (BISCo), and Environmental Quality Company/Resolution Partners (EQ/RP) mobilized to the RRG/Clayton Site to accept receipt of the Enviroblend, the lead stabilization reagent intended for use at the Site;
- For the week of October 2, 2006, a full time on site presence was re-established. Completed activities for the week included the performance of a plastic sheeting integrity investigation; the completion of lead stabilization activities for the stockpile #2 soils; and the shipment of 39 loads (an estimated 860 tons) of TSCA soils from Stockpiles #6 and 3 for offsite disposal at the EQ Wayne Disposal facility (EQ Wayne) in Belleville, Michigan. Other project-related activities included the receipt of potassium permanganate (K_2MnO_4), the chosen reagent for the chemical oxidation of the RCRA VOC soils in stockpiles #4/4B and 5C; the shipment of a load of scrap steel for recycling; and a change in START personnel assigned to the Site;
- Waste shipment activities continued during the week of October 9, 2006. Throughout the week, a total of 52 loads (an estimated 1,144 tons) of TSCA soils from Stockpiles #3, 5, 5B, 7, TP-24/TP-25, TP-50/GC, TP-54, GP-15, GC, and GP-5/GP-6 were shipped to EQ Wayne for disposal. Other notable activities that took place during the week included the shipment of 11 loads of concrete waste off site for recycling; the receipt of the analytical results from the post-treatment Stockpile #2 confirmatory composite sample; the shipment of and Site visits by OSC Turner and IEPA Mike Grant; and
- From October 13 through 20, 2006, key Site activities included the shipment of the final load (load #92) of TSCA only soils from Stockpile #7 (1 load shipped), the discovery of drum carcasses and possibly impacted soils during the attempted demolition of the loading dock located at the eastern portion of the EZ 4 Work Zone, the loading out of material from tank G8 for future off site disposal, and the preparation of the tank G8 carcass for future off site recycling.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for September 18 – 22, 2006; Appendix B – Weekly Summary of Site Activities for September 25 – 29, 2006; Appendix C – Weekly Summary of Site Activities

for October 2 - 6, 2006; Appendix D - Weekly Summary of Site Activities for October 9 - 13, 2006; and Appendix E - Weekly Summary of Site Activities for October 13 - 20, 2006.

1.2 SAMPLING AND ANALYSIS

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action under request by the Respondents. This request was approved by OSC Turner on April 20, 2006.

Several waste characterization samples were collected at the RRG/Clayton Site during the reporting period. On October 3, 2006, 4 post-treatment confirmation sample aliquots were collected by EQ/RP from Stockpile #2 to determine the effectiveness of the lead stabilization process. Material from 4 randomly selected locations of the treated stockpile were placed into 1-pint Ziploc bags and shipped to the EQ Wayne laboratory for compositing and analysis for TCLP lead. Analytical results from the resultant composite sample were received from EQ on October 9, 2006, and are provided for review as Appendix F of this Status Report.

During the week of October 16, 2006, an 8-point composite soil sample, and a sludge sample were collected from the exposed interior of the loading dock area for waste characterization purposes. A liquid sample was also collected from a drum identified as A-1 that was discovered inside the Waste Drum Storage Building during a Site reconnaissance with Veolia. Additionally, 10 wipe samples were collected to determine the effectiveness of equipment decontamination procedures following the loading out of the materials from tank G8. It should be noted that the wipe samples and the drum sample are only being analyzed for the presence of PCBs. All of these samples were delivered to TEK-Lab, Inc. of Collinsville, Illinois for sample analysis. Analytical results from these samples were not received during the reporting period. As such, they will be provided in Status Report #13.

1.3 REMOVAL ACTION WORK

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through E of this report.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

The submitted material from the post-treated stockpile #2 soils was determined to exhibit a noticeable odor upon receipt at the EQ Wayne laboratory. Subsequently, the composited sample was analyzed for VOCs and SVOCs in addition to TCLP lead. The VOC analysis revealed that elevated concentrations of Trichloroethene (TCE) and Tetrachloroethene (PCE) were present in the sample at RCRA qualifying concentrations. Subsequently, the offsite disposal of these soils has been delayed pending the completion of the chemical oxidation of the material to remove the VOCs.

The initiation of the chemical oxidation of Site soils to produce VOC removal/reduction has been delayed pending approval from U.S. EPA to commence the approved treatment process.

No additional problems or issues are anticipated for the upcoming period.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

As mentioned in Section 1.2, a total of 14 samples were collected at the RRG/Clayton Site during the reporting period. These samples were comprised of 2 soil samples, 1 sludge sample, 1 drum sample, and 10 wipe samples. However, the only analytical results that were received during the reporting period were for the post-treatment stockpile #2 sample. A copy of the analytical report from that sample is enclosed as Appendix F. These data have been summarized and are provided in tabular form for review as Appendix G.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD

4.1 SITE PLANS

During the upcoming reporting period (October 23, 2006, through November 17, 2006), the following activities are anticipated:

- The Respondents will receive approval/authorization from U.S. EPA to begin the chemical oxidation treatment of the remaining soils at the RRG/Clayton Site.
- EQ, BISCo, and CRA will complete VOC treatment of the remaining soils (stockpiles #2, 4/4B and 5C), and, following receipt of acceptable confirmatory data, will ship those treated soils to EQ Wayne for disposal as a TSCA waste;
- EQ will complete off site disposal of the sludge and stormwater runoff from tank G8 at the Veolia Port Arthur, Texas facility;
- The remaining drummed materials at the Site will be processed for off-Site disposal in accordance with the analytical results from the collected waste characterization samples;
- The shipment of materials off-Site for disposal will continue; and
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the remaining removal activities.

4.2 SAMPLING AND ANALYSIS

During the upcoming reporting period, material characterization samples will be collected to determine the effectiveness and/or completion of the soil treatment activities. Personnel from EQ will collect the process samples and submit them to the EQ Wayne Disposal Facility laboratory for analysis. The samples will be analyzed for the presence of TCLP VOCs. These samples will be collected and analyzed for disposal characterization in accordance with typical industry practices and standards.

4.3 REMOVAL ACTION WORK

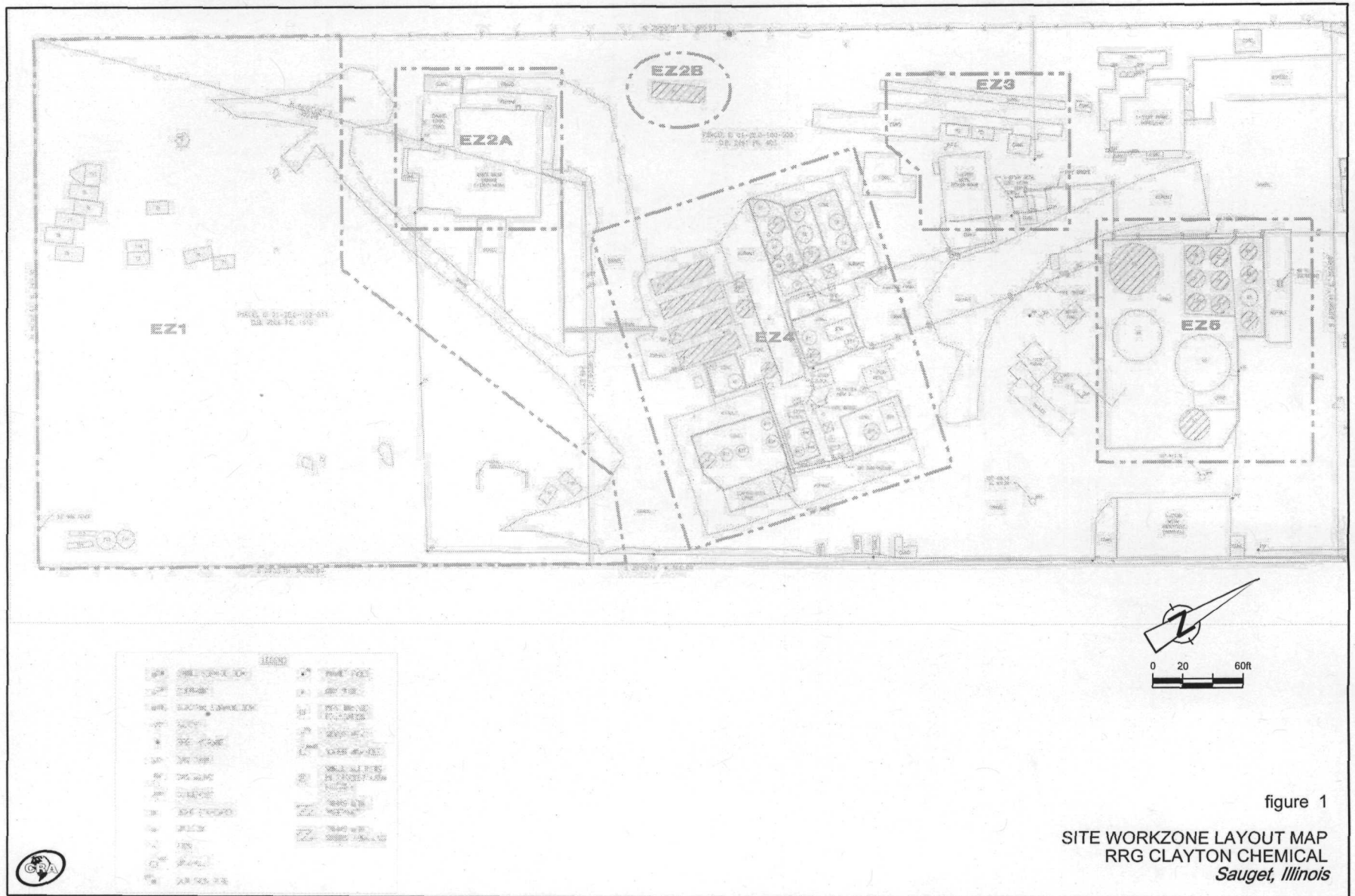
Among the activities expected to be performed and/or completed during the upcoming report period are the assembly of hazardous and non-hazardous wastes; soil treatment activities; soil management activities; waste characterization and disposal activities. An anticipated schedule for these activities appears below.

5.0 ANTICIPATED SCHEDULE

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Install Stormwater Control Measures	As needed/ongoing	October 23, 2006
Continue Tank Sludge Disposal	Ongoing/30 days	October 23, 2006
Continue Characterization of Drum Wastes/Drum Processing	Ongoing/30 days	October 23, 2006
Continue Assembly of Site Wastes For Offsite Shipment	Ongoing/30 days	October 23, 2006
Continued Planning of Technical Design, Construction, and Scheduling of Cap	30 days	October 23, 2006
Continue Soil Treatment and Removal Activities	3 weeks	November 6, 2006
Submit Status Report #13	1 day	November 30, 2006

FIGURE 1

SITE MAP



APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR SEPTEMBER 18 – 22, 2006



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/57 DATE: October 31, 2006

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: Weekly Summary Of Site Activities For September 18 – September 22, 2006

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the forty-second week (the period September 18 through September 22, 2006) is presented below.

Date	Tasks	Activity
Sept. 18, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence was on site due to no field activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continues discussions with Veolia to dispose of the contents of Tank G8 and the drums of stormwater pumped from the plastic sheeting that was in place above G8 during the week of August 21, 2006
	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

Date	Tasks	Activity
Sept. 18, 2006	Soil Sampling/Excavation	No field activity. The Respondents continue to develop an appropriate soil/material management plan for submission to U.S. EPA for review and approval
	Miscellaneous	No activity
Sept. 19, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence was on site due to no field activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continues discussions with Veolia to dispose of the contents of Tank G8 and the drums of stormwater pumped from the plastic sheeting that was in place above G8 during the week of August 21, 2006
	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. The Respondents continue to develop an appropriate soil/material management plan for submission to U.S. EPA for review and approval
	Miscellaneous	No activity
Sept. 20, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence was on site due to no field activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continues discussions with Veolia to dispose of the contents of Tank G8 and the drums of stormwater pumped from the plastic sheeting that was in place above G8 during the week of August 21, 2006
	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal

Date	Tasks	Activity
Sept. 20, 2006	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. The Respondents continue to develop an appropriate soil/material management plan for submission to U.S. EPA for review and approval
	Miscellaneous	No activity
Sept. 21, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence was on site due to no field activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continues discussions with Veolia to dispose of the contents of Tank G8 and the drums of stormwater pumped from the plastic sheeting that was in place above G8 during the week of August 21, 2006
	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. The Respondents continue to develop an appropriate soil/material management plan for submission to U.S. EPA for review and approval
	Miscellaneous	No activity
Sept. 22, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence was on site due to no field activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continues discussions with Veolia to dispose of the contents of Tank G8 and the drums of stormwater pumped from the plastic sheeting that was in place above G8 during the week of August 21, 2006

Date	Tasks	Activity
Sept. 22, 2006	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (312-402-1776), or Phil Harvey (773-380-9933) for clarification.

Attachment

APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR SEPTEMBER 25 - 29, 2006



**CONESTOGA-ROVERS
& ASSOCIATES**

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www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/56 DATE: October 31, 2006

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: Weekly Summary Of Site Activities For September 25 - September 29, 2006

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the forty-third week (the period September 25 through September 29, 2006) is presented below.

Date	Tasks	Activity
Sept. 25, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence was on site due to no field activities. Sharon Newlon participated in a conference call with OSC Turner and Tom Turner of U.S. EPA to present the status of the soil/material management plan. U.S. EPA was told that mobilization was most likely towards the end of the week. OSC Turner requested additional information on the chemical oxidation treatment discussed in the draft proposal and requested that the final proposal be submitted by 09/28/06
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continues discussions with Veolia to dispose of the contents of Tank G8 and the drums of stormwater pumped from the plastic sheeting that was in place above G8 during the week of August 21, 2006

Date	Tasks	Activity
Sept. 25, 2006	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No field activity. The Respondents continue to develop an appropriate soil/material management plan for submission to U.S. EPA for review and approval
	Miscellaneous	No activity
Sept. 26, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence was on site due to no field activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continues discussions with Veolia to dispose of the contents of Tank G8 and the drums of stormwater pumped from the plastic sheeting that was in place above G8 during the week of August 21, 2006
	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. The Respondents began to develop a response to OSC Turner requests of 09/25/06
	Miscellaneous	No activity
Sept. 27, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence was on site due to no field activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06

Date	Tasks	Activity
Sept. 27, 2006	AST Sampling/Cleaning Removal	No activity. CRA continues discussions with Veolia to dispose of the contents of Tank G8 and the drums of stormwater pumped from the plastic sheeting that was in place above G8 during the week of August 21, 2006
	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. The Respondents continue to develop a response to OSC Turner requests of 09/25/06. CRA, Brandenburg Industrial Service Company (BISCo), and Environmental Quality (EQ), the soil treatment sub-contractor for BISCo make arrangements to mobilize to the Site on 09/29/06
	Miscellaneous	No activity
Sept. 28, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence was on site due to no field activities. The Respondents submitted a written response to the issues raised by OSC Turner during the 09/25/06 conference call. The submitted response included a draft Revised Work Plan to address the treatment/management of the mixed RCRA/TSCA soils excavated from the eastern portion of the Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continues discussions with Veolia to dispose of the contents of Tank G8 and the drums of stormwater pumped from the plastic sheeting that was in place above G8 during the week of August 21, 2006
	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

Date	Tasks	Activity
Sept. 28, 2006	Soil Sampling/Excavation	No activity. The Respondents continue to develop an appropriate soil/ material management plan for submission to U.S. EPA for review and approval
	Miscellaneous	No activity
Sept. 29, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence was on site due to no field activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continues discussions with Veolia to dispose of the contents of Tank G8 and the drums of stormwater pumped from the plastic sheeting that was in place above G8 during the week of August 21, 2006
	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (312-402-1776), or Phil Harvey (773-380-9933) for clarification.

Attachment

APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR OCTOBER 2 – 6, 2006



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
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www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Marcia R. Sivek/ko/58 DATE: October 31, 2006

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
G. Daley

RE: Weekly Summary Of Site Activities For October 2 - 6, 2006

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the forty-fourth week (the period October 2 through October 6, 2006), is presented below.

Date	Tasks	Activity
October 2, 2006	Mobilization Activities	Brandenburg Industrial Service Company (BISCo), Environmental Quality Company/ Resolution Partners (EQ/RP), and Conestoga-Rovers & Associates (CRA) personnel mobilized to the Site for soil treatment and soil removal activities. BISCo mobilized four 40-cubic yard (yd ³) mix boxes and 64 35-gallon drums of potassium permanganate (K ₂ MnO ₄) to the Site for use in the chemical oxidation treatment intended to remove the volatile organic compounds (VOCs) in the stockpiled soils excavated from the eastern portion of the Site. BISCo also received two shipments of reinforced plastic sheeting, also to facilitate the chemical oxidation efforts
	Project Coordination	New START personnel Bob Hill was present on Site to observe activities. OSC Turner visited and toured the site with START Bob Hill. The Respondents submitted Status Report # 11 to U.S. EPA

Date	Tasks	Activity
October 2, 2006	Site Preparation	BISCo re-secured the previously excavated areas. BISCo also cleared vegetation in areas of the Site that soil removal activities were to take place
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No soil sampling, excavation or soil removal activities occurred. CRA and BISCo toured the site to inspect the soil stockpiles and verify the integrity of the plastic sheeting beneath the piles by visual observations
	Miscellaneous	No activity
October 3, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was present on site to observe Site activities
	Site Preparation	BISCo placed reinforced plastic sheeting on the ground adjoining the east side of Stockpile # 2. A portion of the stockpile was spread onto the new plastic sheeting to create a lower stockpile profile and afford better/more thorough mixing of the soils and Enviroblend (the lead stabilization reagent)
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

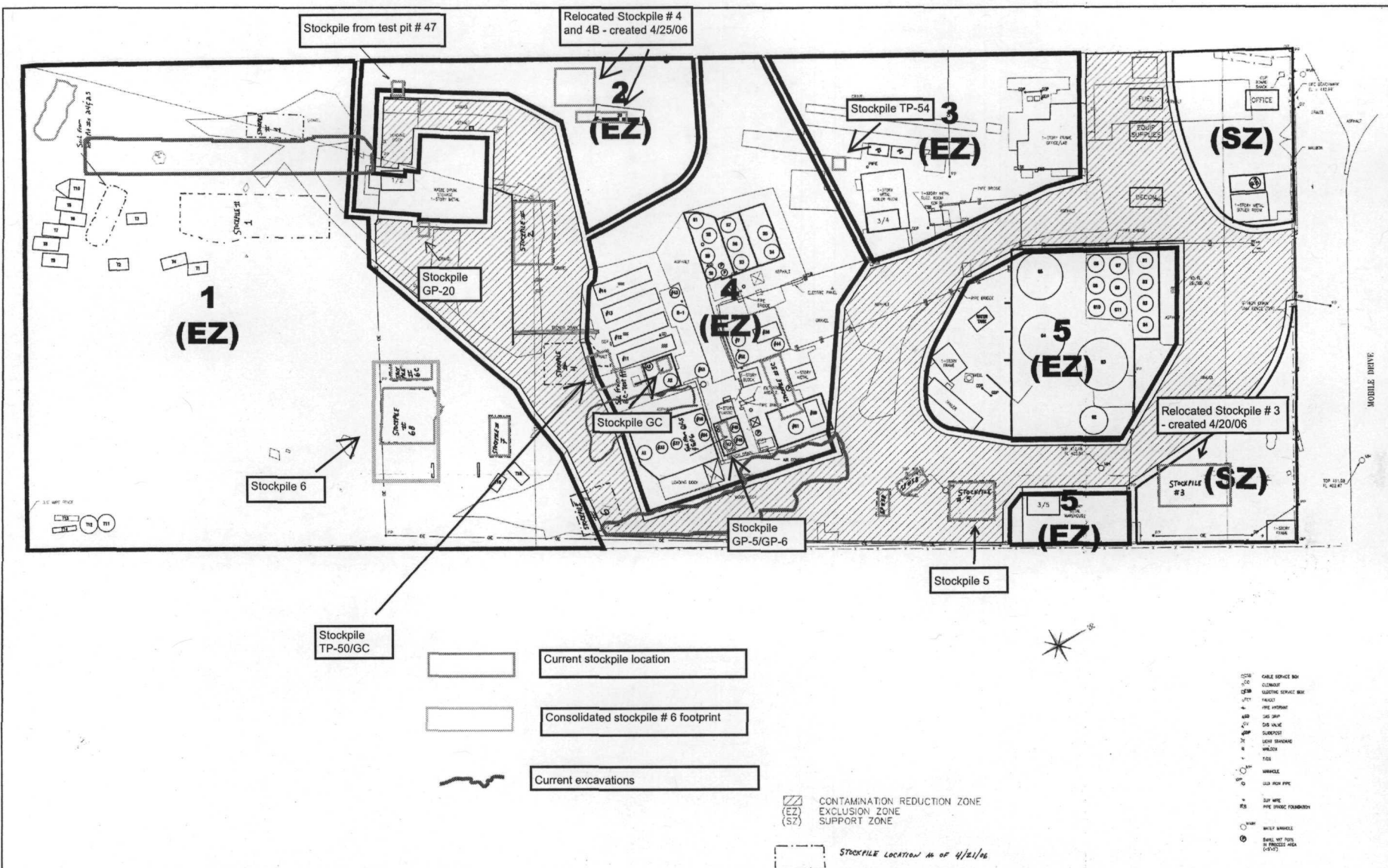
Date	Tasks	Activity
October 3, 2006	Soil Sampling/Excavation	BISCo shipped materials from Stockpile # 6 offsite to the EQ Wayne Disposal Facility (EQ Wayne) in Belleville, MI. An estimated 220 tons of soils were transported, via trucks from US Bulk Transport, Inc. (US Bulk), in 10 loads. BISCo also added Enviroblend to the stockpile # 2 soils and blended it per EQ/RP directions. EQ/RP collected four 1-pint soil samples, and shipped the samples to the EQ Wayne laboratory for TCLP Lead analysis
	Miscellaneous	No activity
October 4, 2006	Mobilization Activities	CRA partially demobilized from the Site and EQ/RP demobilized from the Site
	Project Coordination	START Bob Hill was present on site to observe Site activities. The Respondents participated in a conference call with U.S. EPA to discuss the completion of the requested plastic sheeting inspection beneath the soil Stockpiles # 2, 5C, and 7 (the stockpiles within the proposed cap perimeter)
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo shipped roughly 220 tons of materials from Stockpile # 6 in 10 loads to EQ Wayne for disposal via US Bulk
	Miscellaneous	No activity
October 5, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was present on site to observe Site activities. The Respondents submitted photographs to U.S. EPA showing the presence of plastic sheeting beneath soil stockpiles in response to the 10/04/06 conference call

Date	Tasks	Activity
October 5, 2006	Site Preparation	BISCo sprayed the roadways on Site with water for dust control
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA and BISCo discussed the logistics for the pumping the ponded stormwater on top of the plastic sheeting above tank G8 in preparation for forecasted additional rain over the upcoming weekend. CRA also continued discussions with Veolia about the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo shipped roughly 220 tons of materials from Stockpile # 6 in 10 loads to EQ Wayne for disposal via US Bulk. BISCo dug 10 test pits into Stockpiles # 2 and # 7 to verify plastic integrity beneath the soil, with START Hill observing 2 of the 10 locations
	Miscellaneous	No activity
October 6, 2006	Mobilization Activities	BISCo and CRA personnel demobilized from the Site
	Project Coordination	No onsite START presence
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia about the loading logistics and disposal of the contents of tank G8. Recovered scrap steel from tank 13 was shipped offsite by Grossman Steel and Recycling (Grossman) for recycling
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite for disposal (roughly 125' shipped offsite to Grossman)

Date	Tasks	Activity
October 6, 2006	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
October 6, 2006	Soil Sampling/Excavation	BISCo shipped roughly 198 tons of materials from Stockpiles # 6 (6 loads) and # 3 (3 loads) to EQ Wayne for disposal via US Bulk
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (312-402-1776) or Phil Harvey (773-380-9933) for clarification.

Attachment



Brandenburg
Industrial Service Company

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DATE	ISSUED TO	REFERENCE DRAWING	REV.	DATE	DESCRIPTION

SCALE: 1"=30'-0"	15'	30'	45'	60'	75'	90'
DATE: 30-Nov-2005	DRAWN BY:					
PLOT FILE: CLAYTON.PLT	CHECKED BY:					

FILE: Clayton Chemical Site
Sauget, Illinois
Overall Site Plan

DRAWING:
1 of 1

APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR OCTOBER 9 – 13, 2006



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Marcia R. Sivek/ko/55 DATE: October 31, 2006

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
G. Daley

RE: Weekly Summary Of Site Activities For October 9 - 13, 2006

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the forty-fifth week (the period October 9 through October 13, 2006) is presented below.

Date	Tasks	Activity
October 9, 2006	Mobilization Activities	Brandenburg Industrial Service Company (BISCO), and Conestoga-Rovers & Associates (CRA) personnel mobilized to the Site
	Project Coordination	START personnel Bob Hill was present on Site to observe activities
	Site Preparation	BISCO re-secured the previously excavated areas with tape and re-covered Stockpiles # 4/4B and 5C (plastic sheeting was torn or removed by wind over the weekend). BISCO also cleared vegetation in areas of the Site that soil removal activities were to take place
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA and BISCO discussions with Veolia regarding disposal options for miscellaneous drums on Site

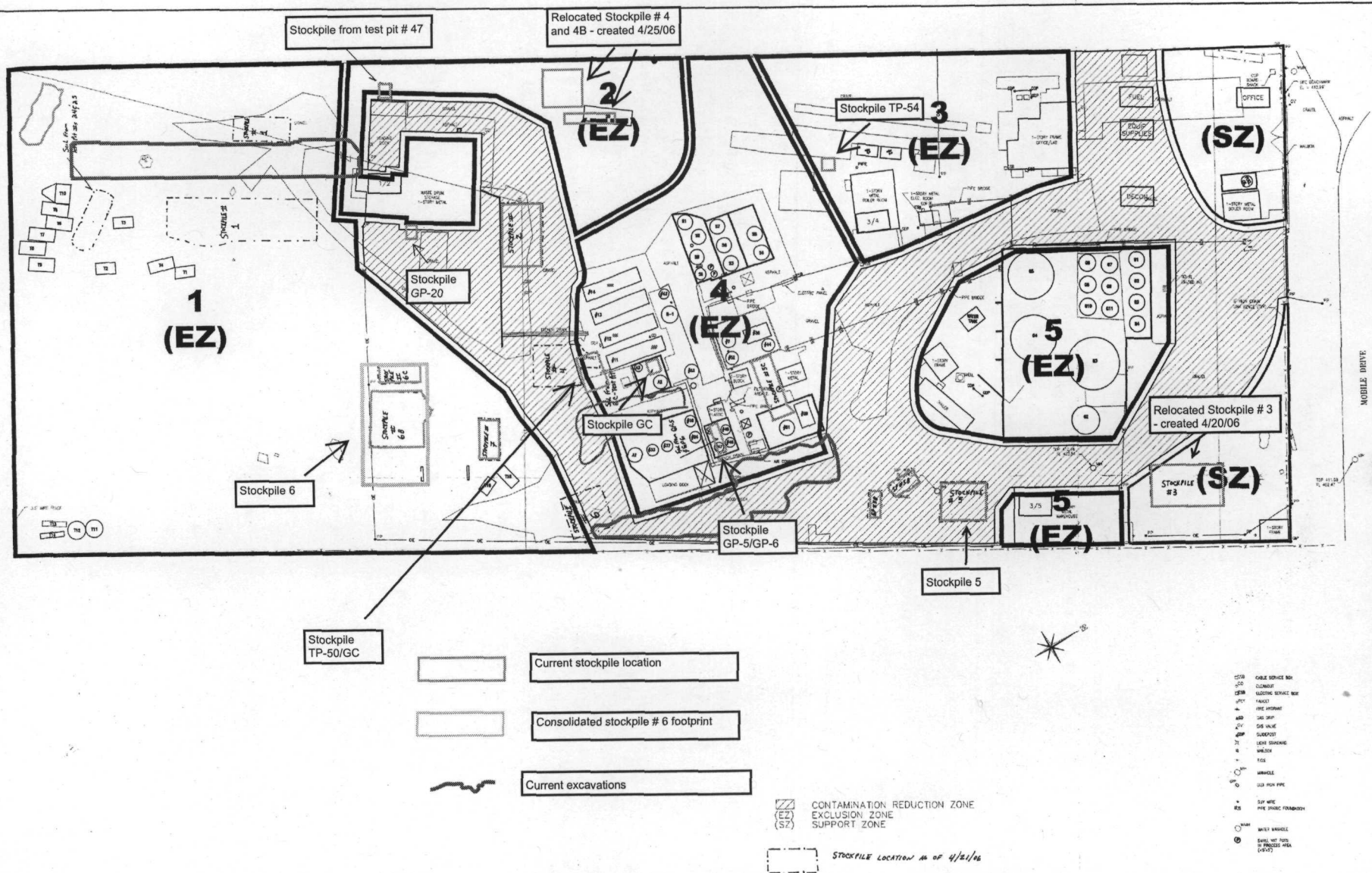
Date	Tasks	Activity
October 9, 2006	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo loaded 10 trucks from US Bulk Transport, Inc. (US Bulk), each carrying approximately 22 tons of soil from Stockpile # 3. CRA was notified by EQ that the samples from the treated Stockpile # 2 soils showed that the lead stabilization procedure was successful, but that the soils were found to contain elevated concentrations of VOCs that warranted treatment using chemical oxidation prior to disposal
	Miscellaneous	Eleven truckloads of concrete were loaded and shipped offsite to Aggregate Recycling Center in Mascoutah, IL
October 10, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence. IEPA Mike Grant on Site to observe soil removal activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA and BISCo continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. Veolia Phil Hellman on site to inventory remaining drums on site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo loaded 10 trucks from US Bulk, each carrying approximately 22 tons of soil. Six loads from Stockpile # 3 and 4 loads from Stockpile # 5
	Miscellaneous	No activity
October 11, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was present on site to observe Site activities. OSC Kevin Turner was on site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06

Date	Tasks	Activity
October 11, 2006	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo loaded 13 trucks from US Bulk, each carrying approximately 22 tons of soil from Stockpile # 5 (5 loads), # 5B (4 loads), GP-15 (1.5 loads), TP-54 (1 load), GC (1 load), and GP-5/GP-6 (0.5 load)
	Miscellaneous	Tyco Healthcare Karen Burke from the Group visited the site
October 12, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was present on site to observe Site activities. Sharon Newlon spoke with OSC Turner to confirm approval to complete removal of Stockpile # 7. OSC Turner expanded the plastic inspection to include Stockpile #4/4B (which is scheduled to undergo chemical oxidation)
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo loaded 9 trucks from US Bulk, each carrying approximately 22 tons of soil from Stockpiles # TP-50/GC (4.5 loads) and # 7 (4.5 loads)
	Miscellaneous	No activity
October 13, 2006	Mobilization Activities	BISCo and CRA personnel demobilized from the Site

Date	Tasks	Activity
October 13, 2006	Project Coordination	START Bob Hill was present on site to observe site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. Veolia Phil Hellman on site to verify drums and drum contents with analytical data
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo loaded 10 trucks from US Bulk, each carrying approximately 22 tons of soil from Stockpiles # TP-24/TP-25 (6 full loads and 4 partial loads) and # 7 (4 partial loads)
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (312-402-1776) or Phil Harvey (773-380-9933) for clarification.

Attachment



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DATE	ISSUED TO	REFERENCE DRAWING	REV.	DATE	DESCRIPTION

SCALE: 1"=30'-0"	15'	30'	45'	60'	75'	90'
DATE: 30-Nov-2005	DRAWN BY:					
PLOT FILE: CLAYTON.PLT	CHECKED BY:					

TITLE: Clayton Chemical Site
Saugel, Illinois
Overall Site Plan

DRAWING:
1 of 1

APPENDIX E

WEEKLY SUMMARY OF SITE ACTIVITIES FOR OCTOBER 16 - 20, 2006



**CONESTOGA-ROVERS
& ASSOCIATES**

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www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Marcia R. Sivek/ko/54 DATE: October 31, 2006

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
G. Daley

RE: **Weekly Summary Of Site Activities For October 16 - 20, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the forty-sixth week (the period October 16 through October 20, 2006) is presented below.

Date	Tasks	Activity
October 16, 2006	Mobilization Activities	Brandenburg Industrial Service Company (BISCO), and Conestoga-Rovers & Associates (CRA) personnel mobilized to the Site for soil treatment and soil removal activities
	Project Coordination	No on site START presence
	Site Preparation	BISCO re-covered Stockpile #4/4B (plastic sheeting was torn or removed by wind over the weekend).
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA and BISCO continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

Date	Tasks	Activity
October 16, 2006	Soil Sampling/Excavation/Removal	BISCo loaded 1 truck from US Bulk Transport, Inc. (US Bulk), carrying approximately 22 tons of soil from Stockpile # 7
	Miscellaneous	No activity
October 17, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was present to observe field activities. IEPA Mike Grant was on Site.
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA and BISCo continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	BISCo collected a liquid sample from Drum A-1 for laboratory analysis of PCBs. The sample was submitted to TEK-Lab, Inc. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

Date	Tasks	Activity
October 17, 2006	Soil Sampling/Excavation	<p>BISCo began demolition activities at the loading dock located at the southeast corner of the EZ 4 Work Zone. Upon removal of the top concrete slab, drum carcasses were observed buried in black silty sand within the dock walls. Roughly 112 drums were assumed to be contained by the dock walls based on counting 7 drums along the south wall by 16 drums along the east wall. Exploration along the north wall indicated that drums were one layer tall, and were sitting on a silty clay layer. Similar exploration at the southeast corner of the dock revealed paint waste in a few of the barrels, and that the drums were sitting on an impenetrable/very hard surface. During the exploration, IEPA Mike Grant stated that the dock was in place when he began inspecting the Site in 1984.</p> <p>CRA collected an 8-point composite soil sample and submitted it to TEK-Lab in Collinsville, IL for waste characterization analysis. CRA also collected a sample of a brown-orange sludge material that leaked from a drum carcass at the north end of the dock during the initial investigation. This sample was also taken to TEK-Lab for analysis. Following sample collection, the area was covered with plastic sheeting</p>
	Miscellaneous	No activity
October 18, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was not present on Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity

Date	Tasks	Activity
October 18, 2006	Miscellaneous	No activity
October 19, 2006	Mobilization Activities	Veolia provided three 20-yd ³ roll-off boxes for loading the contents of Tank G8
	Project Coordination	START Bob Hill and IEPA Mike Grant were present on site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	BISCo loaded out the contents of tank G8 into the provided roll off boxes for future off site disposal at Veolia's Port Arthur, Texas facility. Reinforced plastic sheeting was placed in the expected work area (beneath the roll off boxes and on the concrete tank pad) in preparation of material loading activities. Before loading, the sludge inside G8 was mixed with bottom ash for thickening/paint filter purposes. Approximately 60-yd ³ of material was emptied from G8. The emptied tank carcass was scraped clean in preparation for disassembly
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity
October 20, 2006	Mobilization Activities	BISCo and CRA personnel demobilized from the Site
	Project Coordination	START Bob Hill was present on site to observe site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	BISCo prepared and staged the tank G8 carcass for off site shipment to Grossman Steel for recycling
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site

Date	Tasks	Activity
October 20, 2006	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (312-402-1776) or Phil Harvey (773-380-9933) for clarification.

Attachment

APPENDIX F

ANALYTICAL RESULTS FOR OCTOBER 3, 2006, POST-TREATMENT STOCKPILE #2
COMPOSITE SAMPLE

SAMPLE RESULTS REPORT

Report Date : 10/5/2006



Environmental Quality Company
49350 North I-94 Service Drive
Belleville, MI 48111

734-547-2500

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198

Fax: 608-938-
4500

Sample ID: AA41130

Tracking Number: 224411 R C

Generator: RRG/Clayton Chemical Removal Group

Waste Name: STOCKPILES 2, 4, 5C

LORADO

SUBPART DD ANALYSIS (No Herbs & Pests)

1,1,1-Trichloroethane	34	PPM	6	10/05/2006
1,1,2,2-Tetrachloroethylene	Less Than	PPM	6	10/05/2006
1,1,2-Trichloroethane	Less Than	PPM	6	10/05/2006
1,1-Dichloroethane (Ethylidene dichlorid	Less Than	PPM	6	10/05/2006
1,1-Dichloroethylene (Vinylidene chlorid	Less Than	PPM	6	10/05/2006
1,2,4-Trichlorobenzene	Less Than	PPM	19	10/05/2006
1,2-Dibromo-3-chloropropane	Less Than	PPM	15	10/05/2006
1,2-Dibromochloroethane (Ethylene dibromide)	Less Than	PPM	15	10/05/2006
1,2-Dichloromethane	Less Than	PPM	6	10/05/2006
1,2-Dichloropropane (Propylene dichlorid	Less Than	PPM	18	10/05/2006
1,3-Dichloropropane (cis and trans)	Less Than	PPM	18	10/05/2006
1,4-Dichlorobenzene (p-Dichlorobenzene)	71	PPM	6	10/05/2006
1,4-Dioxane	Less Than	PPM	170	10/05/2006
2,2,4-Trimethylpentane	Less Than	PPM	5	10/05/2006
2,4,5-Trichlorophenol	Less Than	PPM	7.4	10/05/2006
2,4,6-Trichlorophenol	Less Than	PPM	7.4	10/05/2006
2,4-Dinitrophenol	Less Than	PPM	160	10/05/2006
2,4-Dinitrotoluene	Less Than	PPM	140	10/05/2006
2-Chloro-1,3-butadiene (Chloroprene)	Less Than	PPM	5	10/05/2006
2-Nitropropane	Less Than	PPM	5	10/05/2006
Acetaldehyde	Less Than	PPM	5	10/05/2006
Acetonitrile	Less Than	PPM	5	10/05/2006
Acetophenone	Less Than	PPM	9.7	10/05/2006
Acrolein	Less Than	PPM	5	10/05/2006
Acrylonitrile	Less Than	PPM	84	10/05/2006
Allyl chloride (3-chloropropylene)	Less Than	PPM	30	10/05/2006
Benzene	Less Than	PPM	10	10/05/2006
Benzotrichloride (isomers and mixture)	Less Than	PPM	5	10/05/2006
Benzyl chloride	Less Than	PPM	5	10/05/2006
Bromomethane (Methyl bromide)	Less Than	PPM	15	10/05/2006
Carbon Disulfide	Less Than	PPM	4.8	10/05/2006
Carbon Tetrachloride	Less Than	PPM	6	10/05/2006
Chlorobenzene	28	PPM	6	10/05/2006
Chloroethane (Ethyl chloride)	Less Than	PPM	6	10/05/2006
Chloroform	Less Than	PPM	6	10/05/2006
Chloromethane (Methyl chloride)	Less Than	PPM	30	10/05/2006
Chloromethyl methyl ether b	Less Than	PPM	5	10/05/2006
Dibenzofurans	Less Than	PPM	5	10/05/2006
Dichloroethyl ether (bis(2-chloroethyl) e	Less Than	PPM	6	10/05/2006
Dimethyl carbamoyl chloride c	Less Than	PPM	50	10/05/2006
Epichlorohydrin	Less Than	PPM	5	10/05/2006
Ethyl acrylate	Less Than	PPM	5	10/05/2006
Ethyl Benzene	78	PPM	10	10/05/2006
Heptachlorobenzene	Less Than	PPM	10	10/05/2006
Hexachlorobutadiene	Less Than	PPM	5.6	10/05/2006
Hexachlorocyclohexane	Less Than	PPM	30	10/05/2006
Hexane	Less Than	PPM	5	10/05/2006

Isophorone	Less Than	PPM	5	10/05/2006
Isopropylbenzene (Cumene)	Less Than	PPM	5	10/05/2006
Methanol	Less Than	PPM	0.75	10/05/2006
Methyl ethyl ketone	Less Than	PPM	36	10/05/2006
Methyl iodide (Iodomethane)	Less Than	PPM	65	10/05/2006
Methyl isobutyl ketone	Less Than	PPM	33	10/05/2006
Methyl methacrylate	Less Than	PPM	160	10/05/2006
Methyl tert butyl ether	Less Than	PPM	5	10/05/2006
Methylene Chloride (Dichloromethane)	Less Than	PPM	30	10/05/2006
m,m-Dimethylaniline	Less Than	PPM	5	10/05/2006
Naphthalene	Less Than	PPM	5.6	10/05/2006
Nitrobenzene	Less Than	PPM	14	10/05/2006
o-Toluidine	Less Than	PPM	5	10/05/2006
Pentachloronitrobenzene (quintobenzene)	Less Than	PPM	4.8	10/05/2006
Pentachlorophenol	Less Than	PPM	7.4	10/05/2006
Propionaldehyde	Less Than	PPM	5	10/05/2006
Propylene oxide	Less Than	PPM	5	10/05/2006
Styrene	Less Than	PPM	5	10/05/2006
Styrene oxide	Less Than	PPM	5	10/05/2006
Tetrachloroethylene	350	PPM	6	10/05/2006
Toluene	150	PPM	10	10/05/2006
Tribromomethane (Bromoform)	Less Than	PPM	15	10/05/2006
Trichloroethylene	70	PPM	6	10/05/2006
Vinyl acetate	Less Than	PPM	5	10/05/2006
Vinyl bromide	Less Than	PPM	5	10/05/2006
Vinyl Chloride	Less Than	PPM	6	10/05/2006
Xylene (Isomers and mixture)	360	PPM	30	10/05/2006
Diethylene Glycol Diethyl Ether	Less Than	PPM	5	10/05/2006
Ethylene Glycol Monobutyl Ether Acetate	Less Than	PPM	5	10/05/2006
Ethylene Glycol Monomethyl Ether Acetate	Less Than	PPM	5	10/05/2006
Acetone	Less Than	PPM	160	10/05/2006
Bromodichloromethane	Less Than	PPM	15	10/05/2006
n-Butanol	Less Than	PPM	2.6	10/05/2006
Chlorodibromomethane	Less Than	PPM	15	10/05/2006
2-Chloroethyl vinyl ether	Less Than	PPM	5	10/05/2006
Cresol (total)	Less Than	PPM	11.2	10/05/2006
Cyclohexanone	Less Than	PPM	0.75	10/05/2006
1,3 Dichlorobenzene (m-dichlorobenzene)	Less Than	PPM	6	10/05/2006
1,2 Dichlorobenzene (o-dichlorobenzene)	60	PPM	6	10/05/2006
cis-1,3-Dichloropropylene	Less Than	PPM	10	10/05/2006
Ethyl Ether	Less Than	PPM	160	10/05/2006
Isobutanol	Less Than	PPM	170	10/05/2006
Methylene Chloride	Less Than	PPM	30	10/05/2006
Pyridine	Less Than	PPM	16	10/05/2006
trans 1,2 Dichloroethylene	Less Than	PPM	30	10/05/2006
Trichloromonofluoromethane	Less Than	PPM	30	10/05/2006
1,1,2-Trichloro-1,1,2-Trifluoroethane	Less Than	PPM	30	10/05/2006
Biphenyl	Less Than	PPM	5	10/05/2006
ethylene oxide	Less Than	PPM	10	10/05/2006

TCLP Lead

TCLP Lead

Less than

MG/L

0.24

10/05/2006

TCLP ZHE CONSTITUENTS

1,4-DICHLOROBENZENE

0.50

MG/L

0.1

10/05/2006

MEK

Less Than

MG/L

0.1

10/05/2006

CHLOROFORM

Less Than

MG/L

0.1

10/05/2006

BENZENE

Less Than

MG/L

0.1

10/05/2006

CARBON TETRACHLORIDE

Less Than

MG/L

0.1

10/05/2006

1,2-DICHLOROETHANE

Less Than

MG/L

0.1

10/05/2006

1,1-DICHLOROETHYLENE

Less Than

MG/L

0.2

10/05/2006

VINYL CHLORIDE

Less Than

MG/L

0.1

10/05/2006

TRICHLOROETHYLENE

1.3

MG/L

0.09

10/05/2006

10/09/2006 14:24 3
10/06/2006 09:31 7346993194

EQ PMG

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TETRACHLOROETHYLENE
CHLOROBENZENE

3.2
0.47

MG/L
MG/L

0.05
0.05

10/05/2006
10/05/2006

Validated By:



Andrea Schultz
Laboratory Supervisor

APPENDIX G

SUMMARY TABLE OF STOCKPILE #2 POST-TREATMENT COMPOSITE SAMPLE RESULTS

RESOURCE RECOVERY GROUP/LAYTON CHEMICAL COMPANY (RRG/LAYTON) SITE				
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS				
STOCKPILE SAMPLES				
	RCRA Toxic Concentration/TSCA Threshold/EPA Industrial-Commercial SROs			
Sample Date		3/1/2006	4/1/2006	10/3/2006
Sample Time		1100	1625	
Stockpile #		Stockpile # 2	Stockpile # 1	Stockpile # 2
Sample ID			S-002106-GD-008	S-002106-GD-009
No. of Sample Aliquots		12	1	4 - composited by the lab
Parameter				
TCMP Metals				
Arsenic	5.0	0.013		NA
Barium	100.0	0.96		NA
Cadmium	1.0	0.045		NA
Chromium	5.0	0.05		NA
Lead	5.0	18		ND
Selenium	1.0	0.0044		NA
Silver	5.0	0.0027		NA
Mercury	0.2	ND		NA
PCBs				
Aroclor 1216		ND	ND	NA
Aroclor 1221		ND	ND	NA
Aroclor 1232		ND	ND	NA
Aroclor 1242		ND	13	NA
Aroclor 1248		ND	ND	NA
Aroclor 1254		40	20	NA
Aroclor 1261		11	ND	NA
Total	50.0	101	35	NA
TCMP SEMI-VOLATILE ORGANIC COMPOUNDS				
2,4,6-Trichlorophenol	400.0	ND	ND	NA
2,4,6-Trichlorophenol	3.0	ND	ND	NA
2,4-Dinitrochlorobenzene	0.13	ND	ND	NA
2-Methylphenol	100.0	0.0071	ND	NA
3,4-Dichlorophenol	400.0	0.021	ND	NA
Hexachlorocyclopentadiene	0.13	ND	ND	NA
Hexachlorocyclopentadiene	0.5	ND	ND	NA
Hexachlorocyclopentadiene	3.0	ND	ND	NA
Nonachlorocyclopentadiene	3.0	ND	ND	NA
Trichlorophenol	100.0	ND	ND	NA
Phenol	5.0	ND	ND	NA

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE				
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS				
STOCKPILE SAMPLES				
	RCRA Toxic Concentration/TSCA Threshold/EPA Industrial-Commercial SRDs			
Sample Date	3/31/2006	8/2/2006	10/3/2006	
Sample Time	1100	1625		
Stockpile #	Stockpile # 2	Stockpile # 2	Stockpile # 2	
Sample ID		S-082106-CD-008	SZBGRAB-Composite	
No. of Sample Aliquots	12	8	4 - as compiled by the lab	
TOTAL SEMIVOLATILE ORGANIC COMPOUNDS				
Benzene		ND	NA	
Aroclor 1248		ND	NA	
Carbon tetrachloride		ND	NA	
1,1,1-Trichloroethane		5.7	NA	
1,1,2-Trichloroethane		2.2	NA	
1,1,1,2-Tetrachloroethane		3.7	NA	
1,1,2,2-Tetrachloroethane		ND	NA	
1,1,1,2,2-Pentachloroethane		ND	NA	
1,1,2,2,2-Pentachloroethane		1.3	NA	
Chlorobenzene		2.3	NA	
1,2-Dichlorobenzene		6.2	NA	
1,3-Dichlorobenzene		ND	NA	
1,4-Dichlorobenzene		1.7	NA	
Bromobenzene		1.5	NA	
Bromodichlorobenzene		1.3	NA	
Bromotrichlorobenzene		ND	NA	
1,2-Dibromobenzene		ND	NA	
1,3-Dibromobenzene		ND	NA	
1,4-Dibromobenzene		ND	NA	
1,2,3-Trichlorobenzene		ND	NA	
1,2,4-Trichlorobenzene		ND	NA	
1,3,5-Trichlorobenzene		ND	NA	
1,2,4,5-Tetrachlorobenzene		ND	NA	
1,2,3,4-Tetrachlorobenzene		ND	NA	
1,2,3,5-Tetrachlorobenzene		ND	NA	
1,2,3,6-Tetrachlorobenzene		ND	NA	
1,2,4,6-Tetrachlorobenzene		ND	NA	
1,3,4,6-Tetrachlorobenzene		ND	NA	
1,2,3,4,5-Pentachlorobenzene		ND	NA	
1,2,3,4,6-Pentachlorobenzene		ND	NA	
1,2,3,5,6-Pentachlorobenzene		ND	NA	
1,2,3,4,5,6-Hexachlorobenzene		ND	NA	
1,1,1,2,2,2-Hexachloroethane		ND	NA	
1,1,1,2,2,3-Hexachloroethane		ND	NA	
1,1,1,2,3,3-Hexachloroethane		ND	NA	
1,1,1,3,3,3-Hexachloroethane		ND	NA	
1,1,2,2,3,3-Hexachloroethane		ND	NA	
1,1,2,2,3,4-Hexachloroethane		ND	NA	
1,1,2,2,3,5-Hexachloroethane		ND	NA	
1,1,2,2,4,4-Hexachloroethane		ND	NA	
1,1,2,2,4,5-Hexachloroethane		ND	NA	
1,1,2,2,4,6-Hexachloroethane		ND	NA	
1,1,2,3,3,4-Hexachloroethane		ND	NA	
1,1,2,3,3,5-Hexachloroethane		ND	NA	
1,1,2,3,4,4-Hexachloroethane		ND	NA	
1,1,2,3,4,5-Hexachloroethane		ND	NA	
1,1,2,3,4,6-Hexachloroethane		ND	NA	
1,1,2,3,5,6-Hexachloroethane		ND	NA	
1,1,2,4,4,5-Hexachloroethane		ND	NA	
1,1,2,4,4,6-Hexachloroethane		ND	NA	
1,1,2,4,5,6-Hexachloroethane		ND	NA	
1,1,3,3,4,4-Hexachloroethane		ND	NA	
1,1,3,3,4,5-Hexachloroethane		ND	NA	
1,1,3,3,4,6-Hexachloroethane		ND	NA	
1,1,3,3,5,6-Hexachloroethane		ND	NA	
1,1,3,4,4,5-Hexachloroethane		ND	NA	
1,1,3,4,4,6-Hexachloroethane		ND	NA	
1,1,3,4,5,6-Hexachloroethane		ND	NA	
1,1,3,5,5,6-Hexachloroethane		ND	NA	
1,1,4,4,5,6-Hexachloroethane		ND	NA	
1,1,4,5,5,6-Hexachloroethane		ND	NA	
1,1,5,5,6,6-Hexachloroethane		ND	NA	
1,2,2,3,3,4-Hexachloroethane		ND	NA	
1,2,2,3,3,5-Hexachloroethane		ND	NA	
1,2,2,3,3,6-Hexachloroethane		ND	NA	
1,2,2,3,4,4-Hexachloroethane		ND	NA	
1,2,2,3,4,5-Hexachloroethane		ND	NA	
1,2,2,3,4,6-Hexachloroethane		ND	NA	
1,2,2,3,5,6-Hexachloroethane		ND	NA	
1,2,2,4,4,5-Hexachloroethane		ND	NA	
1,2,2,4,4,6-Hexachloroethane		ND	NA	
1,2,2,4,5,6-Hexachloroethane		ND	NA	
1,2,2,5,5,6-Hexachloroethane		ND	NA	
1,2,3,3,4,4-Hexachloroethane		ND	NA	
1,2,3,3,4,5-Hexachloroethane		ND	NA	
1,2,3,3,4,6-Hexachloroethane		ND	NA	
1,2,3,3,5,6-Hexachloroethane		ND	NA	
1,2,3,3,6,6-Hexachloroethane		ND	NA	
1,2,3,4,4,5-Hexachloroethane		ND	NA	
1,2,3,4,4,6-Hexachloroethane		ND	NA	
1,2,3,4,5,6-Hexachloroethane		ND	NA	
1,2,3,5,5,6-Hexachloroethane		ND	NA	
1,2,3,6,6,6-Hexachloroethane		ND	NA	
1,2,4,4,5,6-Hexachloroethane		ND	NA	
1,2,4,5,5,6-Hexachloroethane		ND	NA	
1,2,4,6,6,6-Hexachloroethane		ND	NA	
1,3,3,4,4,5-Hexachloroethane		ND	NA	
1,3,3,4,4,6-Hexachloroethane		ND	NA	
1,3,3,4,5,6-Hexachloroethane		ND	NA	
1,3,3,5,5,6-Hexachloroethane		ND	NA	
1,3,3,6,6,6-Hexachloroethane		ND	NA	
1,3,4,4,5,6-Hexachloroethane		ND	NA	
1,3,4,5,5,6-Hexachloroethane		ND	NA	
1,3,4,6,6,6-Hexachloroethane		ND	NA	
1,3,5,5,6,6-Hexachloroethane		ND	NA	
1,3,6,6,6,6-Hexachloroethane		ND	NA	
1,4,4,5,5,6-Hexachloroethane		ND	NA	
1,4,4,6,6,6-Hexachloroethane		ND	NA	
1,4,5,5,6,6-Hexachloroethane		ND	NA	
1,4,6,6,6,6-Hexachloroethane		ND	NA	
1,5,5,6,6,6-Hexachloroethane		ND	NA	
1,6,6,6,6,6-Hexachloroethane		ND	NA	

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE				
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS				
STOCKPILE SAMPLES				
	RCRA Toxic Concentration/SCRA Threshold/IEPA Industrial-Commercial SROs			
Sample Date	3/31/2006	5/21/2006	10/3/2006	
Sample Time	11:00	16:25		
Stockpile #	Stockpile # 2	Stockpile # 2	Stockpile # 2	
Sample ID		S-02106-GD-008	SZERGRAC-Compsite	
No. of Sample Aliquots	15	4	4 - composite by the lab	
2,4,6-Trichlorophenol		ND	ND	
1,3-Dibromobenzene		ND	ND	
2-Chlorodibenzodioxane		ND	NA	
2-Nitroanisole		ND	NA	
Dimethylphthalate		ND	NA	
2,6-Dimethylbenzene		ND	NA	
Avenaphthalene		ND	NA	
5-Nitroisobutylbenzene		ND	NA	
Benzonitrile		ND	NA	
Phenol		ND	NA	
1,2-Dichlorobenzene		ND	ND	
2-Chlorophenol		ND	NA	
2-Methylphenol		ND	ND	
2,2-Dichloro-1,1-Dichloroethane		ND	NA	
Acetylene		ND	ND	
N,N-Dimethylpropylamine		ND	NA	
Hexachlorobenzene		ND	ND	
Nitrobenzene		ND	ND	
1,4-Dioxane		0.76	ND	
2-Nitrophenol		ND	NA	
2,4-Dimethylphenol		ND	NA	
1,2-Dichloroethane		ND	NA	
2,4-Dichlorophenol		ND	NA	
Total SVOC (mg/kg)		94.36		
Stockpile Volume - max (cups)	350	350		
Stockpile Volume - max (kg)		117.315		
Mass SVOC (kg)		32		
Mass SVOC (mg)		0.039		
TOTAL VOLATILE ORGANIC COMPOUNDS				
1,1,1-Trichloroethane	1.7	0.34	ND	ND
1,2-Dichloroethane	0.5	2.1	0.0051	ND
1,4-Dichlorobenzene	7.3	0.96	0.34	0.50
Benzene	0.5	6.4	0.047	ND
Carbon tetrachloride	0.5	ND	ND	ND
Chlorobenzene	100.0	3.1	0.13	0.47
Chloroform	0.0	6.9	0.0096	ND
Methyl ethyl ketone	100.0	1.6	ND	ND
Tetrachloroethene	0.7	3.1	0.51	3.20
Trichloroethene	0.5	48	0.53	1.30
Vinyl chloride	0.2	ND	ND	ND
Total				5.47
TOTAL VOLATILE ORGANIC COMPOUNDS				
Acetone		ND	ND	

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE				
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS				
STOCKPILE SAMPLES				
	RCRA Toxic Concentrations/TSCA Threshold/EPA Industrial-Commercial SROs			
Sample Date		3/21/2006	8/21/2006	10/3/2006
Sample Time		100	16:35	
Stockpile #		Stockpile # 2	Stockpile # 2	Stockpile # 2
Sample ID			S-002106-G-008	SZERCRAB-Composite
No. of Sample Aliquots		12	8	4 - composited by the lab
Trichloroethane			14	70
Trichloroethene			ND	ND
1,1,2-Trichloro-1,2,2-trifluoroethane			ND	ND
Vinyl Chloride			ND	ND
Dichloroethane			22	100
Total VOC's (mg/kg)			218.64	
Stockpile Volume - max (liters)		700	350	
Stockpile Volume - max (kg)			117.515	
Mass VOC's (kg)			68	
Mass VOC's (tons)			0.075	
TCFP PESTICIDES				
Chlorpyrifos	0.003	ND		NA
Endosulfan	0.020	ND		NA
Imidacloprid	0.4	ND		NA
Permethrin	0.008	ND		NA
Permethrin spinale	0.008	ND		NA
Malathion	10.0	ND		NA
Disulfoton	0.5	ND		NA
TCFP HERBICIDES				
2,4-D	1.0	ND		NA
2,4-D	10.0	ND		NA

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRC/CLAYTON) SITE				
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS				
STOCKPILE SAMPLES				
	RCRA Toxic Concentration/TSCA Threshold/EPA Industrial-Commercial SROs			
Sample Date	3/1/2006	3/1/2006	10/3/2006	
Sample Time	11:00	14:15		
Stockpile #		Stockpile # 2	Stockpile # 2	Stockpile # 2
Sample ID		S-002106-GD-005	S2106RA0-C, composite	
No. of Sample Aliquots	12	8	4 - computed by the lab	
GENERAL CHEMISTRY				
Cyanide	Nil			NA
Reactive Sulfide	3.3			NA
Phenolics	11			NA
Paint Filter Test	Nil			NA
pH	8.3			NA
Ignitability	NA			NA
Extractable Organic Halides	150			NA
Percent Moisture	NA			NA

Notes:

1. All concentrations are reported in parts per million.
2. Analytical data shown is from samples collected during 2005/06 Remedial Action efforts.
3. Analytical data shown is being evaluated against the RCRA Toxicity limits, and TSCA threshold values.
4. Evaluation standards (column B) are bolded for emphasis.
5. A dash (-) in column B indicates that no evaluation threshold was found.
6. Bolded cells represent data that exceeded the applicable evaluation threshold value.
7. NA means data was not analyzed for.
8. Blank cells mean data was neither requested nor reported.
9. ND means the analysis was not detected.